

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

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Mohsin Khawaja	:	
	:	
v.	:	
	:	
Bay Management Group, LLC f/k/a Bay	:	CIVIL ACTION NO.
Management Group Philadelphia, LLC d/b/a Bay	:	
Property Management Group; and Bay	:	
Management Group Philadelphia, LLC; and Dana	:	
Anderson; and JOHN DOES 1-5; and ABC	:	
COMPANIES 1-5	:	

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Mohsin Khawaja	:	COURT OF COMMON PLEAS
	:	PHILADELPHIA COUNTY
v.	:	
	:	
Bay Management Group, LLC f/k/a Bay	:	DECEMBER TERM
Management Group Philadelphia, LLC d/b/a Bay	:	NO. 000997
Property Management Group; and Bay	:	
Management Group Philadelphia, LLC; and Dana	:	
Anderson; and JOHN DOES 1-5; and ABC	:	
COMPANIES 1-5	:	

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**NOTICE OF REMOVAL**

TO THE HONORABLE JUDGES OF THE UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF PENNSYLVANIA:

Defendants, Bay Management Group, LLC, Bay Management Group Philadelphia, LLC and Dana Anderson (collectively, "Defendants"), by and through their attorneys, Marshall Dennehey Warner Coleman & Goggin, hereby remove the above-captioned case to this Honorable Court and provides notice of same to counsel representing the Plaintiff. In support of the removal, Bay Management Group, LLC, Bay Management Group Philadelphia, LLC and Dana Anderson aver as follows:

1. On December 16, 2021, Plaintiff filed a Complaint in the Court of Common Pleas of Philadelphia County, Pennsylvania against Defendants, styled: **Mohsin Khawaja v. Bay Management**

**Group, LLC f/k/a Bay Management Group Philadelphia, LLC d/b/a Bay Property Management Group; Bay Management Group Philadelphia, LLC; Dana Anderson; John Does 1-5; and ABC Companies 1-5,** December Term 2021, No. 000997. Plaintiff's Complaint is attached hereto as Exhibit "1."

2. Defendants were served with Plaintiff's Complaint on December 20, 2021 and December 21, 2021, respectively.

3. As Defendants were served on December 20, 2021 and December 21, 2021, Defendants have not yet filed an Answer or other response to the Complaint. In filing this Notice of Removal, Defendants do not waive any defense or counterclaim that may be available to it.

4. This Notice of Removal is timely filed pursuant to 28 U.S.C. §1446(b) because it is filed within thirty (30) days of when Defendants were served with the Complaint.

5. This Honorable Court's jurisdiction is based upon diversity of citizenship under 28 U.S.C. §1332.

6. Federal courts have original diversity jurisdiction over actions in which the matter in controversy exceeds seventy-five thousand dollars (\$75,000.00) and the parties are citizens of different states. 28 U.S.C. §1332.

7. Specifically, "[a] district court's determination as to the amount in controversy must be based on the 'plaintiff's complaint at the time [the] petition for removal was filed,'" **Werwinski v. Ford Co.**, 286 F.3d 661, 666 (3d. Cir. 2002), quoting **Steel Valley Auth. v. Union Switch & Signal**, 809 F2d 1006, 1010 (3d. Cir. 1987).

8. Moreover, "Section 1332 has been interpreted to require 'complete diversity.'" **Ruhrgas AG v. Marathon Oil Co.**, 526 U.S. 574, 580 n. 2 (1999). Thus, diversity jurisdiction "applies only to

cases in which the citizenship of each plaintiff is diverse from the citizenship of each defendant. Caterpillar, Inc. v. Lewis, 519 U.S. 61, 68 (1996).

9. Here, Plaintiff's Complaint avers that Plaintiff resides at 7014 Pennsylvania Avenue, Upper Darby, PA 19082. As a result, Defendants herein believe that Plaintiff is a citizen of the Commonwealth of Pennsylvania on the date when this action was commenced. *See* Ex. 1, at ¶ 1.

10. Bay Management Group, LLC is organized in the State of Maryland and its principal place of business is located at 6 Halbright Court, Timonium, MD 21093. *See* Affidavit of Carolyn Freeze, at ¶ 3, attached hereto as Exhibit "2." The sole member of Bay Management Group, LLC is a trust organized under the laws of the State of Maryland, for the beneficiary of a Maryland resident. *Id.*

11. Bay Management Group Philadelphia, LLC is organized in the State of Maryland and its principal place is located at 6 Halbright Court, Timonium, MD 21093. *See* Affidavit of Dana Anderson, at ¶ 4, attached hereto as Exhibit "3." The two individual members of Bay Management Group Philadelphia, LLC are residents of the State of Maryland and the State of Delaware, respectively. *Id.*

12. Dana Anderson resides at 877 Sweet Birch Drive, Middletown, Delaware. Ex. 1, at ¶ 4.

13. Based upon the foregoing, there is complete diversity among the parties identified in Plaintiff's Complaint.

14. Next, Plaintiff's Complaint alleges claims of (1) defamation; (2) tortious interference with prospective contracts; and (3) vicarious liability/respondeat superior. Ex. 1, at ¶¶ 31-36; 37-44; 42-45. Specifically, Count I of Plaintiff's Complaint alleges that "plaintiff has suffered damages" and demands "an amount in excess of \$50,000, interest, costs, attorneys' fees, [and] punitive damages." *See* Ex. 1, at ¶ 36. Count II of Plaintiff's Complaint alleges that "Defendants severely damages Plaintiff's business interests, has harmed Plaintiff's reputation; has severely damaged Plaintiff's goodwill and has caused Plaintiff to sustain damages in excess of \$50,000." Ex. 1, at ¶ 40. Count III of Plaintiff's Complaint further demands

judgment "in an amount in excess of \$50,000, plus costs, pre and post judgment interest, fees, and any relief this Court deems just." *See* Ex. 1, at ¶ 45.

15. As a result, it is evident that the amount in controversy exceeds \$75,000 and is a matter which may be removed to this Honorable Court pursuant to 28 U.S.C. § 1441.


16. Written notice of this filing will be given to Plaintiff. Also, as required by 28 U.S.C. § 1446(d), a copy of this Notice of Removal will also be filed with the Prothonotary of the Court of Common Pleas of Philadelphia County, Pennsylvania, the court in which the State Court Action was filed.

WHEREFORE, Defendants, Bay Management Group, LLC, Bay Management Group Philadelphia, LLC and Dana Anderson respectfully request that the above action, now pending in the Court of Common Pleas of Philadelphia County, Pennsylvania, be removed therefrom and proceed in this Court as an action duly removed.

Respectfully submitted,

**MARSHALL DENNEHEY WARNER  
COLEMAN & GOGGIN**

BY: \_\_\_\_\_

  
LEE C. DURIVAGE  
Identification Number: 205928  
2000 Market Street, Suite 2300  
Philadelphia, PA 19103  
Phone: (215) 575-2584  
Email: lcdurivage@mdwecg.com

Attorney for Defendants: Bay Management Group,  
LLC, Bay Management Group Philadelphia, LLC  
and Dana Anderson

Dated: January 14, 2022

**CERTIFICATE OF SERVICE**

I, Lee C. Durivage, Esquire, do hereby certify that a true and correct copy of Bay Management Group, LLC, Bay Management Group Philadelphia, LLC and Dana Anderson's Notice of Removal, was electronically filed with the Court on January 14, 2022, and is available for viewing and downloading from the ECF System.

**MARSHALL DENNEHEY WARNER  
COLEMAN & GOGGIN**

BY: \_\_\_\_\_  
LEE C. DURIVAGE

# EXHIBIT 1

Court of Common Pleas of Philadelphia County  
Trial Division**Civil Cover Sheet**

For Prothonotary Use Only (Docket Number)	
<b>DECEMBER 2021</b>	<b>000997</b>
E-Filing Number: 2112032595	
PLAINTIFF'S NAME MOHSIN KHAWAJA	DEFENDANT'S NAME BAY MANAGEMENT GROUP, LLC, ALIAS: D/B/A BAY PROPERTY MANAGEMENT GROUP
PLAINTIFF'S ADDRESS 7014 PENNSYLVANIA AVENUE UPPER DARBY PA 19082	DEFENDANT'S ADDRESS 6 HALBRIGHT COURT TIMONIUM MD 21093
PLAINTIFF'S NAME	DEFENDANT'S NAME BAY MANAGEMENT GROUP PHILADELPHIA, LLC
PLAINTIFF'S ADDRESS	DEFENDANT'S ADDRESS 6 HALBRIGHT COURT TIMONIUM MD 21093
PLAINTIFF'S NAME	DEFENDANT'S NAME DANA ANDERSON
PLAINTIFF'S ADDRESS	DEFENDANT'S ADDRESS 877 SWEET BIRCH DRIVE MIDDLETOWN DE 19709
TOTAL NUMBER OF PLAINTIFFS 1	TOTAL NUMBER OF DEFENDANTS 5
COMMENCEMENT OF ACTION <input checked="" type="checkbox"/> Complaint <input type="checkbox"/> Petition Action <input type="checkbox"/> Notice of Appeal <input type="checkbox"/> Writ of Summons <input type="checkbox"/> Transfer From Other Jurisdictions	
AMOUNT IN CONTROVERSY <input type="checkbox"/> \$50,000.00 or less <input checked="" type="checkbox"/> More than \$50,000.00	COURT PROGRAMS <input type="checkbox"/> Arbitration <input type="checkbox"/> Mass Tort <input type="checkbox"/> Commerce <input type="checkbox"/> Settlement <input checked="" type="checkbox"/> Jury <input type="checkbox"/> Savings Action <input type="checkbox"/> Minor Court Appeal <input type="checkbox"/> Minors <input type="checkbox"/> Non-Jury <input type="checkbox"/> Petition <input type="checkbox"/> Statutory Appeals <input type="checkbox"/> W/D/Survival <input type="checkbox"/> Other:
CASE TYPE AND CODE 2L - LIBEL, SLANDER, MISREPRESENT	
STATUTORY BASIS FOR CAUSE OF ACTION	
RELATED PENDING CASES (LIST BY CASE CAPTION AND DOCKET NUMBER)	IS CASE SUBJECT TO COORDINATION ORDER? YES      NO
<p style="text-align: center;"><b>FILED</b> <b>PRO PROTHY</b> <b>DEC 16 2021</b> <b>S. RICE</b></p>	
<b>TO THE PROTHONOTARY:</b> Kindly enter my appearance on behalf of Plaintiff/Petitioner/Appellant: <u>MOHSIN KHAWAJA</u> Papers may be served at the address set forth below.	
NAME OF PLAINTIFF'S/PETITIONER'S/APPELLANT'S ATTORNEY JEFFREY J. GOLDIN	ADDRESS ALAN L FRANK LAW ASSOCIATES PC 135 OLD YORK RD JENKINTOWN PA 19046
PHONE NUMBER (215) 935-1000	FAX NUMBER (215) 935-1110
SUPREME COURT IDENTIFICATION NO. 312689	E-MAIL ADDRESS jgoldin@alflaw.net
SIGNATURE OF FILING ATTORNEY OR PARTY JEFFREY GOLDIN	DATE SUBMITTED Thursday, December 16, 2021, 11:32 am

**COMPLETE LIST OF DEFENDANTS:**

1. BAY MANAGEMENT GROUP, LLC  
ALIAS: D/B/A BAY PROPERTY MANAGEMENT GROUP  
6 HALBRIGHT COURT  
TIMONIUM MD 21093
2. BAY MANAGEMENT GROUP PHILADELPHIA, LLC  
6 HALBRIGHT COURT  
TIMONIUM MD 21093
3. DANA ANDERSON  
877 SWEET BIRCH DRIVE  
MIDDLETOWN DE 19709
4. JOHN DOES 1-5  
UNKNOWN  
UNKNOWN PA 19100
5. ABC COMPANIES 1-5  
UNKNOWN  
UNKNOWN PA 19100



ALAN L. FRANK LAW ASSOCIATES, P.C.

By: Alan L. Frank, Esquire  
Jeffrey J. Goldin, Esquire

Identification No.: 34414/ 312689

135 Old York Road  
Jenkintown, PA 19046

Tel: (215) 935-1000

Fax: (215) 935-1110

Filed and Attested by the  
MAJOR JURY PROGRAM

Office of Judicial Records  
16 DEC 2021 11:32 am

S. RICE

Attorneys for Plaintiff

Mohsin Khawaja  
7014 Pennsylvania Avenue  
Upper Darby, PA 19082

Plaintiff,

v.

Bay Management Group, LLC f/k/a Bay  
Management Group Philadelphia, LLC d/b/a Bay  
Property Management Group  
6 Halbright Court  
Timonium, MD 21093

And

Bay Management Group Philadelphia, LLC  
6 Halbright Court  
Timonium, MD 21093

And

Dana Anderson  
877 Sweet Birch Drive  
Middletown, DE 19709

And

JOHN DOES 1-5 and ABC COMPANIES 1-5.  
Defendants.

IN THE COURT OF COMMON PLEAS  
PHILADELPHIA COUNTY,  
PENNSYLVANIA

CIVIL ACTION NO.

**CIVIL ACTION**  
**NOTICE TO DEFEND**

You have been sued in court, if you wish to defend against the claims set forth in the following pages, you must take action within twenty (20) days after this complaint and notice are served, by entering a written appearance personally or by attorney and filing in writing with the court your defenses or objections to the claims set forth against you. You are warned that if you fail to do so the case may proceed without you and a judgment may be entered against you by the court without further notice for any money claimed in the complaint or for any other claim or relief requested by the plaintiff. You may lose money or property or other rights important to you. YOU SHOULD TAKE THIS PAPER TO YOUR LAWYER AT ONCE. IF YOU DO NOT HAVE A LAWYER OR CANNOT AFFORD ONE, GO TO OR TELEPHONE THE OFFICE SET FORTH BELOW TO FIND OUT WHERE YOU CAN GET LEGAL HELP.

**LAWYER REFERRAL SERVICE**

Philadelphia County  
One Reading Center, 11th Floor  
Philadelphia, PA 19107  
(215) 238-6333  
TTY (215) 451-6197

**ALAN L. FRANK LAW ASSOCIATES, P.C.**

By: Alan L. Frank, Esquire  
Jeffrey J. Goldin, Esquire  
Identification No.: 34414/ 312689  
135 Old York Road  
Jenkintown, PA 19046  
Tel: (215) 935-1000  
Fax: (215) 935-1110

**MAJOR JURY PROGRAM**

Attorneys for Plaintiff

Mohsin Khawaja  
7014 Pennsylvania Avenue  
Upper Darby, PA 19082

Plaintiff,

v.

Bay Management Group, LLC f/k/a Bay  
Management Group Philadelphia, LLC d/b/a Bay  
Property Management Group  
6 Halbright Court  
Timonium, MD 21093

And

Bay Management Group Philadelphia, LLC  
6 Halbright Court  
Timonium, MD 21093

And

Dana Anderson  
877 Sweet Birch Drive  
Middletown, DE 19709

And

JOHN DOES 1-5 and ABC COMPANIES 1-5.  
Defendants.

IN THE COURT OF COMMON PLEAS  
PHILADELPHIA COUNTY,  
PENNSYLVANIA

CIVIL ACTION NO.

**COMPLAINT**

Plaintiffs, Mohsin “Mo” Khawaja. (“Plaintiff” or “Khawaja”), by and through their undersigned counsel, files this Complaint based upon the following statement of facts:

**The Parties**

1. Plaintiff is an adult individual who resides at the above-captioned address.

2. Defendant, Bay Management Group, LLC f/k/a Bay Management Group Philadelphia, LLC d/b/a Bay Property Management Group (“BMG”) is a business entity, fictitious name, or corporation, incorporated in Maryland and doing business within the Commonwealth of Pennsylvania with a principal place of business at the above-referenced address.

3. Defendant, a Bay Management Group Philadelphia, LLC (“BMG Philly”) is a business entity, fictitious name, or corporation, incorporated in Maryland and doing business within the Commonwealth of Pennsylvania with a principal place of business and/or registered address at the above-referenced address.

4. Defendant Dana Anderson (“Anderson”) is an adult individual and citizen of Delaware who reside and/or may be served at the above-referenced address.

5. At all times relevant hereto, Defendant Anderson is the president of BMG Philly and is an agent of BMG.

6. Defendants JOHN DOES 1-5 and ABC COMPANIES 1-5 are fictitious designations, representing one or more individuals, proprietorships, associations, limited partnerships, general partnerships, limited liability companies and/or corporations, who are presently unknown or have not yet been identified and who may otherwise be responsible, in whole or in part, for the tortious activities described herein.

### **Jurisdiction**

7. The Commonwealth of Pennsylvania has jurisdiction over each Defendant because each Defendant has extensive contacts within Pennsylvania by conducting a continuous and systematic part of their business within the Commonwealth.

8. In addition, the Commonwealth of Pennsylvania has jurisdiction over Defendants because Plaintiff's causes of action arise out of Defendants' actions in Pennsylvania, and because Defendants have caused harm or tortious injury to Plaintiff in Pennsylvania.

#### **Venue**

9. The Philadelphia County Court of Common Pleas of has venue since Defendants' tortious and defamatory conduct occurred in Philadelphia County and Delaware County, Pennsylvania.

#### **Factual Background**

10. Plaintiff Khawaja has been involved in the development and rental of real estate properties in portions of Philadelphia County and Delaware County for over fourteen (14) years.

11. Over that time, Plaintiff has relied on his reputation and standing with renters in these communities as his primary method to locate new tenants.

12. Plaintiff is known to his tenants and members of the community as "Mo" Khawaja.

13. Plaintiff, over the course of fourteen years, has repeatedly and continuously secured for himself, as well as any entity which Plaintiff has been affiliated with, new renters through word of mouth and referrals from existing tenants.

14. Defendants BMG and BMG Philly (collectively hereafter "BMG Defendants") advertise themselves as a singular property management group which offers services in parts of Maryland, Pennsylvania, Virginia, and Washington D.C.<sup>1</sup>

15. Defendant Anderson is held out as the president of BMG and BMG Philly's

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<sup>1</sup> <https://www.baymgmtgroup.com/locations/>

Pennsylvania territories, including those areas where Plaintiff does business.<sup>2</sup>

16. At all times relevant hereto, Plaintiff is a member of MBMK Property Holdings, LLC and Property Pals, LLC, two entities that purchase rental properties and operate as landlords in Philadelphia and Delaware County.

17. MBMK Property Holdings, LLC currently owns thirteen (13) properties located in Philadelphia and in Delaware County.

18. At all times material hereto, the BMG Defendants were engaged as property managers for MBMK Property Holdings, LLC.

19. At all times relevant hereto, a dispute arose between Plaintiff and the other member of MBMK Property Holdings, LLC.

20. Subsequently thereafter, the BMG Defendants and Defendant Anderson engaged in a smear campaign designed to materially impact Plaintiff's reputation and business opportunities.

21. On December 17, 2020, Defendant Anderson, on BMG's letterhead, issued official notices to all thirteen (13) rental units indicating that:

- Plaintiff "broke into the premises and gave [the current tenant] the keys" and therefore the current occupant of the premises is illegally occupying the property;
- Plaintiff, "who likely identified himself as Mo, has filed for bankruptcy and is being sued for millions of dollars for stealing and nonpayment of debt." (emphasis added);

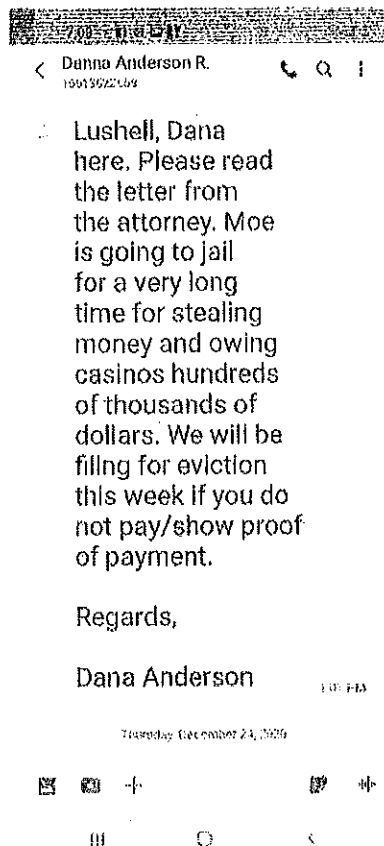
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<sup>2</sup> <https://www.baymgmtgroup.com/about/>

- Plaintiff is a “defected member of the ownership”; and
- The occupant would be ousted as a squatter unless they contact the BMG Defendants.

A copy of the December 17, 2020 letter addressed to the occupant of 245 Burmont Road, Drexel Hill, PA and authored and signed by Defendant Anderson is attached hereto as Exhibit “A”. It is believed that various iterations of this letter were sent to all other MBMK Property Holdings, LLC tenants and a copy thereof of those letters are believed to be in Defendants’ possession.

22. Subsequently, on December 24, 2020, Defendant Anderson contacted another tenant via text message and stated:



23. At all times material hereto, Defendant Anderson made these statements on behalf of the BMG Defendants.

24. At all times material hereto, Defendant Anderson's claim that Plaintiff "broke into the premises", "stole millions of dollars", and was a "defected member of the ownership" were false.

25. Further, at all times material hereto, Defendant Anderson's statement that "Moe is going to jail for a very long time for stealing..." is false.

26. Thereafter, Plaintiff contacted the BMG Defendants' chief operating officer in an effort to have him halt the defamatory and false statements made by Defendant Anderson.

27. In response, Plaintiff received a phone call from Defendant Anderson whereby Defendant Anderson acknowledged Plaintiff's communication and, in retaliation, threatened to, and presumably did, contact a lender of Plaintiff's entity and make additional false statements and allegations that Plaintiff is stealing rental income.

28. Defendant Anderson made these statements either with knowledge of their falsity or with reckless disregard for their falsity.

29. The BMG Defendants ratified and consented to Defendant Anderson's actions and permitted such false statements to be made on behalf of BMG and BMG Philly.

30. As a result of Defendants' conduct, Plaintiff has suffered damages.

**COUNT I**  
**Plaintiff v. Defendants**  
**(Defamation)**

31. The Plaintiff incorporates by reference the foregoing allegations.

32. The statements at issue have a defamatory character because they falsely accuse the Plaintiff of engaging in theft, breaking and entering, and falsely allege that Plaintiff will be imprisoned.

33. Many of the statements are defamatory per se because they accuse the Plaintiff of acting improperly or committing misconduct with regards to its business.

34. The recipients of the defamatory statements understood both the defamatory character of the statements and the statements' application to the Plaintiff.

35. The Defendants acted with knowledge of the statements' falsity or reckless disregard for the statements' falsity.

36. As a result of the Defendants conduct, the Plaintiff has suffered damages.

**WHEREFORE**, the Plaintiff demands judgment in its favor and against Defendants for damages in excess of \$50,000, interest, costs, attorney's fees, punitive damages, an injunction prohibiting further defamatory statements and directing the Defendants to retract those complained of in this case, and such other relief as the Court may deem just and proper.

**COUNT II**  
**Plaintiff v. Defendants**  
**(Tortious Interference with Prospective Contracts)**

37. Plaintiff incorporates by reference the preceding paragraphs of this Complaint as if set forth at length herein.

38. At all times relevant hereto, Plaintiff has relied on word of mouth and referrals from current tenants to enter into contracts with prospective tenants.

39. Defendants took purposeful action specifically intended to harm interfere with Plaintiff's prospective relationships with future tenants to the great harm and detriment of the Plaintiff and to the benefit of the Defendants.



40. By reason of the aforesaid, Defendants severely damaged Plaintiff's business interests, has harmed Plaintiff's reputation; has severely damaged Plaintiff's goodwill and has caused Plaintiff to sustain damages in excess of \$50,000.

41. The actions taken by the Defendants were undertaken without privilege or justification.

**WHEREFORE**, Plaintiff prays for judgment in its favor and against Defendants, in an amount exceeding \$50,000.00 together with costs, prejudgment interest, attorneys' fees and such other relief as may be deemed just, equitable and/or appropriate under the circumstances.

**COUNT III**  
**Plaintiff v. BMG Defendants**  
**(Vicarious Liability/Respondent Superior)**

42. Plaintiff incorporates by reference the preceding paragraphs of this Complaint as if set forth at length herein.

43. At all times material hereto, Defendant Anderson was acting as an agent of the BMG Defendants and was acting within the scope of his agency relationship with the BMG Defendants and

44. As such, the BMG Defendants are vicariously liable for the acts of Defendant Anderson, as more fully described in this Complaint.

45. By virtue of the doctrine of Respondent Superior, the BMG Defendants are liable for the acts Defendant Anderson, as more fully described in this Complaint.

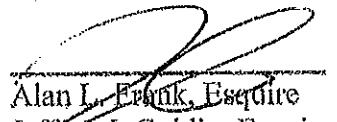
**WHEREFORE**, Plaintiffs hereby demand judgment in their favor against Defendants BMG and BMG Philly, jointly and severally, in an amount in excess of \$50,000, plus costs, pre and post judgment interest, fees, and any relief this Court deems just.

**JURY DEMAND**

46. Plaintiff demands a trial by jury in connection with all claims and causes of action herein asserted.

Respectfully submitted,

**ALAN L. FRANK LAW ASSOCIATES, P.C.**

  
\_\_\_\_\_  
Alan L. Frank, Esquire  
Jeffrey J. Goldin, Esquire  
*Attorneys for Plaintiff*

Dated: December 16, 2021

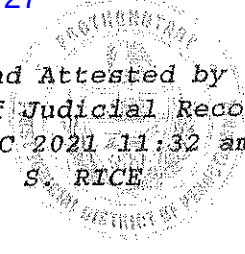
VERIFICATION

I, Mohsin Khawaja verify that I am the Plaintiff in this action. I further state that the facts set forth in the foregoing Complaint are true and correct to the best of my knowledge, information and/or belief. I understand the statements are made subject to the penalties of 18 Pa. C.S. §4904 relating to unsworn falsifications to authorities.

  
Mohsin Khawaja

Dated: 12/15/21

Filed and Attested by the  
Office of Judicial Records  
16 DEC 2021 11:32 am  
S. RICE

The seal of the Southern District of New York is visible in the background of the stamp. It is a circular emblem with the words "SOUTHERN DISTRICT OF NEW YORK" around the perimeter and a central design.

EX. "A"



Bay Management Group Philadelphia  
1000 Delaware Ave. #500  
Philadelphia, PA 19123

12/17/2020

## OFFICIAL NOTICE: 245 Burmont Rd

To whomsoever residing in this property.

Please be advised as your 30 day notice to quit the premises. It was brought to our attention this week that you are residing at the property, 245 Burmont Rd, Drexel Hill, PA 19026, legally as a detached member of the ownership broke into the premises and gave you the keys. This person, who likely identified himself as Mo, has filed for bank upay and is being sued for millions of dollars for stealing and non-payment of debt. We manage this property located at 245 Burmont Rd, Drexel Hill, PA 19026 on behalf of MBW/K Property Holdings. You must reach out to us immediately before we file for a squatter eviction and small claims court for residing there and not paying rent. We won't be open to having you apply for the property and signing an actual lease if you are approved through our application process but we cannot allow you to live there without being under a written lease and payment coming to us.

Please contact Dana Anderson, president of Bay Management Group Philadelphia, immediately at 267-244-7215 ext. 150 in addition to an email at [DAnderson@baymgphila.com](mailto:DAnderson@baymgphila.com). We appreciate your cooperation in this matter.

Regards,

A handwritten signature in black ink, appearing to read 'Dana Anderson', written over a horizontal line.

Dana Anderson

# **EXHIBIT 2**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

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Mohsin Khawaja	:	
	:	
v.	:	
	:	
Bay Management Group, LLC f/k/a Bay	:	CIVIL ACTION NO.
Management Group Philadelphia, LLC d/b/a Bay	:	
Property Management Group; and Bay	:	
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Anderson; and JOHN DOES 1-5; and ABC	:	
COMPANIES 1-5	:	

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Mohsin Khawaja	:	COURT OF COMMON PLEAS
	:	PHILADELPHIA COUNTY
v.	:	
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Bay Management Group, LLC f/k/a Bay	:	DECEMBER TERM
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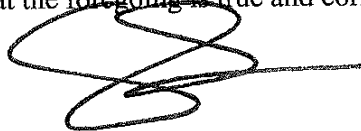
**DECLARATION OF CAROLYN FREEZE**

Pursuant to 28 U.S.C. § 1746, Carolyn Freeze declares the following:

1. I certify that I am Carolyn Freeze and I submit this declaration in support of Defendants' Notice of Removal.
2. At all relevant times, I have been the owner of Bay Management Group, LLC and am familiar with Bay Management Group, LLC's corporate structure.
3. Specifically, Bay Management Group, LLC is a Maryland limited liability company, with its principal place of business located at 6 Halbright Court, Timonium, Maryland 21093. The sole member of Bay Management Group, LLC is the Carolyn Freeze Revocable Trust,

a trust organized under the laws of the State of Maryland. The sole beneficiary of the trust is myself and I am a resident of the State of Maryland.

I declare under penalty of perjury that the foregoing is true and correct.

A handwritten signature in black ink, appearing to be 'Carolyn Freeze', written over a horizontal line.

CAROLYN FREEZE

DATED: 01/12/2022



# **EXHIBIT 3**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

---

Mohsin Khawaja	:	
	:	
v.	:	
	:	
Bay Management Group, LLC f/k/a Bay	:	CIVIL ACTION NO.
Management Group Philadelphia, LLC d/b/a Bay	:	
Property Management Group; and Bay	:	
Management Group Philadelphia, LLC; and Dana	:	
Anderson; and JOHN DOES 1-5; and ABC	:	
COMPANIES 1-5	:	

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Mohsin Khawaja	:	COURT OF COMMON PLEAS
	:	PHILADELPHIA COUNTY
v.	:	
	:	
Bay Management Group, LLC f/k/a Bay	:	DECEMBER TERM
Management Group Philadelphia, LLC d/b/a Bay	:	NO. 000997
Property Management Group; and Bay	:	
Management Group Philadelphia, LLC; and Dana	:	
Anderson; and JOHN DOES 1-5; and ABC	:	
COMPANIES 1-5	:	

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**DECLARATION OF DANA ANDERSON**

Pursuant to 28 U.S.C. § 1746, Dana Anderson declares the following:

1. I certify that I am Dana Anderson and I submit this declaration in support of Defendants' Notice of Removal.
2. At all relevant times, I have been employed by Bay Management Group Philadelphia, LLC as President of Philadelphia which covers Bucks, Montgomery, Delaware, Philadelphia and Chester counties.
3. In my role as President, I am familiar with Bay Management Group Philadelphia, LLC's corporate structure.

4. In particular, Bay Management Group Philadelphia, LLC is a Maryland limited liability company, with its principal place of business located at 6 Halbright Court, Timonium, Maryland 21093. The members of Bay Management Group Philadelphia, LLC are myself and my business partner. Neither myself nor my business partner are residents of the Commonwealth of Pennsylvania.

I declare under penalty of perjury that the foregoing is true and correct.

  
\_\_\_\_\_  
DANA ANDERSON

DATED: 01 / 12 / 2022